

**Plaintiff's Synopsis of
Phillipe Loral Deposition Designations**

Phillipe Loral ("Loral") was the head of Antwerp Bank N.V.'s ("ADB") International Division. In or around 1999 and 2000, Loral was tasked with expanding ADB's diamond client business and establishing ADB's New York office ("ADB-NY"). Loral Tr. 10:04-11:08, 12:09-22, 19:14-21:16. Loral was in charge of ADB-NY, and was closely involved with its relationship with Lazare Kaplan International Inc. ("Lazare"). Id. at 22:01-24:06, 24:19-25:24, 26:05-27:13.

In October 1999, ADB and KBC's New York branch ("KBC-NY") entered into an agreement with respect to the delivery of operational banking services by KBC (the "Services Agreement"). Loral participated in the drafting of the Services Agreement. Id. at 214:14-220:01.

ADB wanted to expand its business to New York, and the purpose of the Services Agreement was to facilitate this objective by allowing New York customers to open current accounts, *i.e.*, operating overdraft bank accounts, in KBC-NY's books. Id. at 214:14-220:01. These accounts were used to effectuate local and international dollar denominated transactions in connection with the customers' credit facilities. Id. at 214:14-220:01. The Services Agreement also required ADB to open a "pooling account" ("ADB's Pooling Account") at KBC-NY. Id. at 248:05-249:02, 222:11-224:18.

KBC-NY provided the funds to effectuate the transactions on the customer's behalf. Id. at 233:05-242:14, 214:14-220:01, 222:11-224:18. At the end of the day, KBC-NY reconciled financial positions between ADB and KBC-NY. Id. at 222:11-224:18.

In 2000, Loral and Lazare's CFO, William Moryto ("Moryto"), negotiated Lazare's Credit Facility in New York. Id. at 102:14-103:07, 64:08-65:07. ADB did not have sole authority to extend a credit facility to Lazare, as KBC's Extended Credit Committee's ("ECC") approval was necessary. Id. at 102:14-103:07, 50:02-15, 58:14-61:12. Lazare's Credit Facility was a working capital line of credit. Id. at 108:09-15, 108:20-110:03, 111:02-113:12, 139:22-142:09, 164:13-165:06, 171:14-175:04.

KBC-NY was Lazare's main banking relationship in the U.S. and in accordance with a May 31, 2001 agreement (and as contemplated by the Services Agreement), Lazare's KBC-NY Bank Account was the exclusive vehicle for payments and disbursements under Lazare's Credit Facility. Id. at 98:05-101:03, 211:23-213:08.